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12  
13 **UNITED STATES BANKRUPTCY COURT**  
14  
**NORTHERN DISTRICT OF CALIFORNIA**  
15  
**SAN FRANCISCO DIVISION**

16 **In re:**

17 **PG&E CORPORATION**

18 **-and-**

19 **PACIFIC GAS AND ELECTRIC  
COMPANY,**

20 **Debtors.**

- 21    Affects PG&E Corporation
- 22    Affects Pacific Gas and Electric Company
- 23    Affects both Debtors

24 \*All papers shall be filed in the Lead Case,  
25 No. 19-30088 (DM)

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**VERIFIED STATEMENT OF CECILY  
A. DUMAS IN SUPPORT OF  
APPLICATION OF THE OFFICIAL  
COMMITTEE OF TORT CLAIMANTS  
FOR ENTRY OF AN ORDER (I)  
CONFIRMING THE SCOPE OF  
EMPLOYMENT OF BAKER &  
HOSTETLER LLP, OR  
ALTERNATIVELY (II) AMENDING  
THE ORDER APPROVING  
APPLICATION OF THE OFFICIAL  
COMMITTEE OF TORT CLAIMANTS  
PURSUANT TO 11 U.S.C. § 1103 AND  
FED. R. BANKR. P. 2014 AND 5002,  
FOR AN ORDER AUTHORIZING  
RETENTION AND EMPLOYMENT OF  
BAKER & HOSTETLER LLP,  
EFFECTIVE AS OF FEBRUARY 15,**

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**2019 (DOC. NO. 1331) (THE  
“RETENTION ORDER”)**

Date: October 22, 2019  
Time: 10:00 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16<sup>th</sup> Floor  
San Francisco, CA 94102  
**Objections Due: October 15, 2019  
4:00 p.m. (Pacific Time)**

8 CECILY A. DUMAS, under penalty of perjury, declares:

9 1. I am a Partner in the Financial Restructuring Group of Baker & Hostetler LLP  
10 (“**Baker**” or the “**Firm**”), counsel to the Official Committee of Tort Claimants (the “**TCC**”) of  
11 PG&E Corporation and Pacific Gas and Electric Company (the “**Debtors**”) in these chapter 11  
12 cases (the “**Cases**”).

13 2. I submit this verified statement (“**Verified Statement**”) pursuant to section 1103(b)  
14 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the “**Bankruptcy**  
15 **Code**”), and Rules 2014 and 5002 of the Federal Rules of Bankruptcy Procedure (the  
16 “**Bankruptcy Rules**”) in support of the contemporaneously-filed Application (the “**Application**”)  
17 of the Official Committee of Tort Claimants for Entry of an Order (i) Confirming the Scope of  
18 Employment of Baker & Hostetler LLP, or Alternatively (ii) Amending the Order Approving  
19 Application of the Official Committee of Tort Claimants Pursuant to 11 U.S.C. § 1103 and Fed.  
20 R. Bankr. P. 2014 and 5002, For an Order Authorizing Retention and Employment of Baker &  
21 Hostetler LLP, Effective as of February 15, 2019 (the “**Retention Order**”). This Verified  
22 Statement also serves as my second supplement to my initial and first verified statements, filed on  
23 March 18, 2019 [Dkt. No. 935] and May 14, 2019 [Dkt. No. 1998] in support of the Application  
24 of the Official Committee of Tort Claimants Pursuant to 11 U.S.C. § 1103 and Fed. R. Bankr. P.  
25 2014 and 5002, For an Order Authorizing Retention and Employment of Baker & Hostetler LLP,  
26 Effective as of February 15, 2019 [Dkt. No. 934] (the “**Original Application**”).

27 3. Unless otherwise stated in this Verified Statement, I have knowledge of the facts  
28 set forth herein and, if called as a witness, I would testify competently thereto. Certain of the

1 disclosures set forth herein relate to matters not within my personal knowledge, but rather within  
2 the personal knowledge of other attorneys and employees at Baker and are based on information  
3 provided by them to me.

4 **The Need for the Relief Requested in the Application**

5 4. The Application seeks either (i) confirmation that the scope of the Retention Order  
6 includes Baker's representation of the TCC in connection with the California North Bay Fire  
7 Cases, JCCP 4955 (the "**State Court Litigation**"), or alternatively (ii) an amendment of the  
8 Retention Order to expressly provide that Baker is authorized to represent the TCC in the State  
9 Court Litigation, effective as of August 21, 2019.

10 5. The TCC has requested that Baker draft pleadings and memoranda in connection  
11 with the State Court Litigation, assist in discovery and participate in the litigation to the extent  
12 necessary to protect the TCC and all Tubbs fire victims' interests. Baker anticipates that some of  
13 the pleadings and memoranda may be filed by the plaintiffs in the State Court Litigation. The  
14 TCC believes that under the terms of the Retention Order Baker may represent the TCC in  
15 connection with the State Court Litigation in order to protect the interests of the TCC. The State  
16 Court Litigation involves claims estimation, confirmation issues, and potential compromise of  
17 controversies, all of which come within the scope of the Retention Order. Moreover, Baker is  
18 authorized to represent the TCC at hearings and other proceedings before tribunals other than this  
19 Court. Baker is also authorized to bring, or participate-in, objections or estimation proceedings  
20 with respect to claims and interests.

21 6. At the time the Original Application was filed, Baker anticipated that all estimation  
22 proceedings would take place between the Debtors and the TCC in this Court. Due to the entry of  
23 the Order Granting the Motion of the Official Committee of Tort Claimants for Relief from  
24 Automatic Stay [Dkt. No. 3644] (the "**Stay Relief Order**"), some of the estimation will essentially  
25 take place in the State Court Litigation, in which the TCC is not a party but has significant interests.

26 7. Out of an abundance of caution, the TCC seeks entry of an order confirming that  
27 Baker may represent the TCC and its interests in the State Court Litigation. Alternatively, if the  
28 Court determines that the present scope of the Retention Order does not include Baker's and the

BAKER & HOSTETLER LLP  
ATTORNEYS AT LAW  
SAN FRANCISCO, CA

1 TCC's participation in the State Court Litigation, the TCC requests that the Court enter an order  
2 amending the Retention Order to authorize Baker to represent the TCC and its interests in  
3 connection with the State Court Litigation, *nunc pro tunc* to August 21, 2019.

4        8. In addition, there will be a number of expert witnesses that will be employed in  
5 connection with the State Court Litigation, as well as in connection with any proceedings in this  
6 Court or the District Court. Baker intends to employ the experts required for the State Court  
7 Litigation in accordance with the procedures established with the U.S. Trustee, the Debtors and  
8 the Official Committee of Unsecured Creditors and memorialized by letter dated July 3, 2019.  
9 Pursuant to the procedures, expert costs will be reflected on Baker's invoices, fee statements and  
10 fee applications as a cost and paid as a pass through cost by Baker. Some of the aforementioned  
11 expert witnesses have or will be retained by counsel for the State Court Litigation plaintiffs, but  
12 will be paid in accordance with the aforementioned letter dated July 3, 2019.

## **Supplemental Disclosures**

14        9.      Baker makes the following supplemental disclosures concerning its connections  
15 with creditors or other parties in interest in these Cases:

16       10. The Debtors have identified Simpson, Gumpertz & Heger as a vendor in these  
17 Cases, and identified The Vanguard Group, Inc. as a significant shareholder and significant holder  
18 of voting securities in these Cases. Baker partners now represent Simpson, Gumpertz & Heger  
19 and The Vanguard Group in unrelated matters.

## Baker's Disinterestedness

11. To the best of my knowledge and except as otherwise set forth in my initial and  
first verified statements and herein, the partners, counsel, associates and employees of  
Baker: (i) do not have any connections with the Debtors, their known creditors, other known or  
potential parties in interest, the U.S. Trustee for Region 17 or any person employed in the San  
Francisco office of the U.S. Trustee, or any United States Bankruptcy Judge for the Northern

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1 District of California, and (ii) do not represent any other entity having an adverse interest in  
2 connection with these Cases.

3 *Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true*  
4 *and correct to the best of my knowledge and belief.*

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6 Executed on September 25, 2019.  
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8 */s/ Cecily A. Dumas*  
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10 Cecily A. Dumas  
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